

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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CHAD PELISHEK,

Plaintiff,

Case No. 23-cv-1048

v.

CITY OF SHEBOYGAN, et. al.,

Defendants.

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**JOINT MOTION FOR A PROTECTIVE ORDER UNDER  
FED. R. CIV. P. 26(c) AND CIVIL L. R. 26(e)**

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By and through their undersigned counsel, Plaintiff Chad Pelishek, and Defendants City of Sheboygan, Ryan Sorenson, Charles Adams, Amanda Salazar, and Emily Rendall-Araujo (Defendants), request this Court enter a Protective Order under Fed. R. Civ. P. 26(c) and Civil L. R. 26(e). In support of this motion, the Parties state as follows:

1. Based on the claims in this case, the Parties anticipate that discovery on all Parties will involve personnel, medical, financial, and otherwise sensitive and confidential information that could injure or harm the Plaintiff, Defendants, or third parties if published.

2. Sensitive information shared among or between the parties and/or third parties without protections of a Protective Order may cause unnecessary damage and injury to the parties or to others including, but not limited to, Plaintiff's medical, financial, and sensitive information as well as confidential personnel or otherwise sensitive matters for the Defendants.

3. The entry of a Protective Order in this case is necessary to protect any confidential, proprietary, medical, financial, sensitive, or otherwise protected information that may be produced

during discovery in this case.

4. Counsel for the Parties agree that the proposed stipulated Protective Order suggested by the Eastern District of Wisconsin is sufficient to protect the Parties' respective confidential and sensitive information addressed herein during discovery and will permit discovery to be conducted without delay.

5. The Parties have agreed on all language in the proposed stipulated Protective Order attached to this motion and respectfully request the Court find good cause to enter the attached proposed Protective Order in this action to facilitate discovery.

6. Pursuant to Civil L.R. 7, no other briefing or supporting documentation is being filed with this motion.

Respectfully Submitted: April 15, 2024

For Plaintiff:

/s/ Jennifer DeMaster

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